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January 9, 2023

VIA ECF

The Honorable Analisa Torres
U.S. District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Zeng et al v. USA QR Culture Industrial Development LLC et al*
Case No. 1:22-CV-07132

Dear Judge Torres:

We represent USA QR Culture Industrial Development LLC d/b/a Hutaoli Music Restaurant & Bar a/k/a Hutaoli, Wei You a/k/a Mr. You, Qun Ce Li a/k/a Jimmy Li, John “Doe” (real name unknown) a/k/a Qun Ce Li’s Partner, and Shuai Zhang (collectively “Defendants”) in the above-referenced action. In accordance with Rule 1.C of Your Honor’s Individual Rules and Practices, we respectfully write to request an extension of Defendants’ time to file an answer¹ to the Complaint to February 6, 2023.² Defendants respectfully submit this request so that they may be afforded additional time to prepare their responsive pleading. This is Defendants’ first request for an extension and Plaintiff consents to this request.

The undersigned sincerely apologizes to the Court for the tardiness of this application, which is due to Defendants’ failure to receive service. Defendants however have agreed to waive any defects in service of process.

In light of the above, and on behalf of all parties, we respectfully request an extension of the deadline to submit a proposed case management plan from January 9, 2023 to January 23, 2023.

¹ As Defendants’ time to respond has expired, the Parties stipulated that Defendants file an answer to the Complaint, exclusive of filing motions, by February 6, 2023.

² Defendants USA QR Culture Industrial Development LLC and Wei You intends to consolidate this action with a previously filed action in the United States District Court for the Southern District of New York which asserts common questions of law and fact. *Liang et al v. USA QR Culture Industrial Development LLC et al*, No. 1:22-cv-04841.

GRANTED. By **January 23, 2023**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: January 10, 2023
New York, New York



ANALISA TORRES
United States District Judge